Letter For Electronic Distribution

Original signed letter on file at the following address:

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April 5, 2000

Mr. John Dirickson, P.E.
Environmental Engineer
Naval Air Station, Fallon
Public Works Department
Environmental Division-Code 187JD
4755 Pasture Rd.
Fallon, NV 89496

RE: NDEP Response to Site 11, Paint Shop
Draft Final Decision Document, August 27, 1999, Sites 4, 7, 9, 10, 11, 12, 17, 18, 19, 23, and 24
Remedial Investigation/Feasibility Study
Naval Air Station Fallon

Dear Mr. Dirickson:

Nevada Division of Environmental Protection (NDEP) staff has reviewed NAS Fallon's Report entitled *Decision Document, Sites 4, 7, 9, 10, 11, 12, 17, 18, 19, 23, and 24, Draft Final,* dated August 27, 1999. This report was prepared in response to a series of NDEP letters which commented on NAS Fallon's report entitled *Record of Decision, Sites 4, 5, 7, 8, 9, 10, 11, 15, 17, 18, 19, 23, 24, 25, 26, 27 Naval Air Station Fallon* (ROD), dated June 5, 1998. Due to significant changes between the Draft Final Decision Document and the Record of Decision, the referenced Draft Final Decision Document was reviewed as a draft document instead of a draft final. NDEP's comments on Site 11, Paint Shop, are addressed in this letter.

The level of detail and explanation presented in the Draft Final Decision Document does not appear to adequately explain the nature and extent of soil and groundwater contamination associated with Site 11. Additionally, based on interpretations presented by NAS Fallon after the Remedial Investigation (RI) Report was completed in September 1994, and on NDEP's review of site conditions and supporting documentation to verify information provided in the Draft Final Decision Document, the NDEP is concerned that significant data gaps remain. In particular, data collected during the Remedial Investigation/Feasibility Study (RI/FS) indicate that groundwater contaminants (TCE, 1,2-DCA and possibly benzene) may originate from Site 11. NAS Fallon has asserted these contaminants originate from Site 16. However, Site 16 was used only for the storage of petroleum fuels and the source for TCE and 1,2-DCA remains unknown. Furthermore, paint wastes were disposed at the ground surface at Site 11 in the past; however, soil samples were not collected in the vadose zone at Site 11 to assess if contaminated

soil exist at Site 11 which may be source for groundwater contamination. Also, the influence of channel sands at Site 11 on contaminant migration does not appear to have been evaluated. Due to a lack of data and data analysis, the extent of contamination and contaminant migration associated with Site 11 do not appear to be well understood.

This document needs to be available to the public for review, as appropriate, and an accurate record in the Decision Document is required so that an informed decision can be made. The Decision Document needs to be prepared so that the public can understand that a potential contaminant source at Site 11 may not have been fully investigated and documented during the RI/FS. Accordingly, the Decision Document needs to include a description of all site characterization work performed after the RI Report was completed in September 1994, including a description of the contaminant plumes that were presented in the Comparison of Groundwater Alternatives Report (CGA Report) dated December 1997. Site conditions cannot be adequately interpreted by the reader if all data collected at the site, including data collected after the RI report was completed, are not summarized through appropriate use of drawings, concentration contour maps, and cross sections. These deficiencies need to be corrected in a revised Decision Document and are detailed in the comments attached to this letter.

Formal approval of a "No Further Action" Decision Document is based on the extent of the investigation and remediation, an understanding of the nature and extent of contamination, documentation in the administrative record, and post closure care which includes institutional controls, land use restrictions, and/or post-closure monitoring. Based on a review of data collected from Site 11 and revised interpretations for the extent of groundwater plumes associated with Site 11 presented by NAS Fallon after the NDEP previously concurred with "No Further Action", the NDEP is concerned that contamination associated with Site 11 could be more extensive than presented in the Draft Final Decision Document. Of considerable concern to the NDEP is that documentation to support the "No Further Action" recommendation in the Draft Final Decision Document does not appear to be included in the administrative record. In a letter dated January 25, 1999, the NDEP requested that supporting documentation (boring logs with soil screening results, laboratory analytical reports, Sampling and Analysis Plan for the RI/FS) be provided to the NDEP. However, these documents have not yet been provided. In consideration of these factors, NDEP's previous concurrence with a "No Further Action" determination is no longer valid.

NAS Fallon needs to re-evaluate Site 11. A proposed plan of action which addresses NAS Fallon's plans for re-evaluating contamination that appears to originate from Site 11 needs to be submitted to the NDEP for review. The plan of action also needs to address NDEP's comments on the Draft Final Decision Document for Site 11 which are attached to this letter. NAS Fallon has not responded to many of NDEP's comments presented in the letter dated January 25, 1999. Comments in that letter which were not addressed in the Draft Final Decision Document are reiterated in the comments attached to this letter.

Since many of the issues regarding Site 11 have been on-going and unresolved for an extended period of time, please provide a time frame for addressing the comments in this letter within 30 days. If we as project managers cannot agree on a process to a resolve these issues, the NDEP will need to initiate the dispute resolution process. If you have any questions, or need further clarification, please do not hesitate to contact me at (775) 687-4670, extension 3053.

Sincerely,

Jeffrey J. Johnson, P.E.
Geological Engineer

JJJ/js Bureau of Federal Facilities
cc:
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COMMENTS ON THE DRAFT FINAL DECISION DOCUMENT
SITE 11, PAINT SHOP

1. Page 1, third paragraph: The Draft Final Decision Document states: "*The decision not to undertake a remedial action for this site is consistent with the factors set forth in the National Contingency Plan (NCP) 40 CFR part 300, and Nevada Administrative Code (NAC) Sections 445A.226 through 445A.22755. This decision was based on one or more of the following"* (three bulleted reasons follow).

   The NDEP cannot concur with the above statement for the following reasons:

   - Supporting documentation appears to be missing from the administrative record. Therefore, NAS Fallon does not appear to be in full compliance with 40 CFR Part 300, Subpart I: Administrative Record for Selection of Response Action. See comments **7A** and **15.**

   - The decision not to take remedial action at Site 11 does not appear to be consistent with NAC 445A.226 through 445A.22755. Maximum Contaminant Limits (MCLs) have been exceeded for TCE and 1,2-DCA which appear to originate from Site 11. These contaminants are not currently being remediated. See comments **3** and **9A**. The Intrinsic Bioremediation study may be an acceptable remediation alternative for Site 11. However, the decision to implement this alternative has not yet been approved by the NDEP.

   - The statement presented after the second bullet on page 1 of the Draft Final Decision Document does not appear to be accurate for the same reasons discussed in the above bullet.

   - A channel sand may extend from Site 11 to the Lower Diagonal Drain, which provides a direct conduit to surface water. NAS Fallon has been silent on this issue. Due to contaminant concentrations exceeding allowable levels at Site 11 and the channel sand, the statement after the first bullet on page 1 of the Draft Final Decision Document may not be accurate. See Comment **4**.

   - A quantitative risk assessment for soils was not conducted for Site 11. A risk assessment for groundwater using data collected from Site 11 was not performed. Therefore, the statement after the third bullet cannot be demonstrated. See Comment **10**.

2. Page 1, last paragraph in Section I: The Draft Final Decision Document states: "*The Nevada Division of Environmental Protection (NDEP) has reviewed this document and concurred with this decision. There are not any nationally significant or precedent setting issues for this site*."

   The NDEP concurrence with "No Further Action" for this site in letters dated May 17, 1994, and August 21, 1997 was based on the assumption that reasonably supporting documentation would be formally presented in the Decision Document. However, numerous issues which are detailed in the comments in this letter have not been acceptably supported by documentation. Concurrence with No Further Action was also provided before proposed, revised interpretations of the groundwater plumes were provided in the draft CGA Report dated December 1997. Due to these factors, the NDEP's previous concurrence with a "No Further Action" determination is no longer valid. See comment **12**.

3. Page 2, Section A, second paragraph on page: "*No contamination was found in relation to the activities at Site 11 and the source of the groundwater contamination below the site is from the dissolved plume from the up gradient Site 16, Old Fuel Farm . The groundwater remediation will be accomplished as part of the Site 16 remedial action.*"

   This statement appears to be inconsistent with data collected during the RI/FS. During the first iteration of RI/FS activities, several phenol compounds were detected in groundwater samples collected from MW-25 (south of Site 16 and east of Site 11). The installation and sampling of monitoring wells at Site 11 were recommended because the contaminants in MW-25 were thought to have originated from Site 11. The Preliminary Site Characterization (PSC) Summary, dated January 1992, states on page 173 "*Because contaminants identified in MW-25 included several phenol compounds believed to be associated with this site* (Site 11, Paint Shop)*, two additional wells will be installed*". The RI Report also states on page 10-44 "*.... because contaminants identified in MW25 (Site 16) included several phenolic compounds believed to be associated with paint shop wastes, sampling was conducted during second iteration activities.*" MW63 and MW64 were subsequently installed at Site 11. Analyses of groundwater samples collected from MW63 and MW64 indicated that concentrations of trichloroethene (TCE) and 1,2-dichloroethane (1,2-DCA) in ground water at Site 11 exceeded the federal MCL of 5 ug/L. TCE is not related to the petroleum fuels which are associated with the leaking underground storage tanks at Site 16. The Decision Document needs to clarify where the source of the solvents described above is located, and how remedial action for the Site 16 plume will remediate the solvents in addition to the petroleum fuels. Alternatively, Site 11 can be remediated separately from Site 16. See comment **15** for additional comments on groundwater contamination at Site 11.

4. Pages 2, Section 1.2 Geology: Site specific geological information was not provided in the Draft Final Decision Document. Therefore, the RI Report was reviewed to determine if site-specific geological information is available for Site 11. A brief description of geologic conditions for Sites 11, 16, 17, 19 and 23 was located on page 10-16. The report states:

   "*The lithology of the Fallon Formation here is predominantly sand, ... These sands are interbedded with silty sands and sandy silts, with minor clayey Silts. .... Monitoring wells MW26, MW27, MW63, MW64, and MW67 contain coarse-grain sediments of a paleo-channel. The sands in these wells appear approximately 5 to 6 ft BGL and have a thickness of 6 to 14 ft.*"

   Monitoring wells MW63 and MW64 were drilled at Site 11. Based on the fence diagram in Figure 10.4 of the RI Report (page 10-15), the channel sand logged in monitoring wells MW63 and MW64 continues south through monitoring wells MW67, MW26, and MW27, and heads towards the Lower Diagonal Drain. A discussion regarding the affects of this channel sand on the migration of contaminants to the Lower Diagonal Drain was not provided in the RI Report, but needs to be provided in the Decision Document. This discussion also needs to address lithologic conditions that were identified in wells installed after the RI Report was completed. This information is critical to understanding contaminant transport and needs to be provided in the Decision Document so that the reader is aware of the potential for contaminants to migrate off base. See comment **9B** for information on contaminant transport velocities through the channel sands.

5. Page 5, Section F, last paragraph in Section: The Draft Final Decision Document states "*The Draft Decision Document dated November 1995 for 6 sites including Site 11 was published on 31 January 1996 in the Lahontan Valley News and the Fallon Eagle Standard. These community participation activities fulfill the requirements of the CERCLA: Section 113(k)(2)(B)(I-v) and 117(a)(2). The Administration Record is available for review at the Churchill County Library.*"

The draft Decision Document dated November 1995 (received by NDEP January 23, 1996) was never completed by NAS Fallon. The NDEP provided comments in a letter dated March 5, 1996. Due to the elapsed time since the original draft Decision Document was published, NAS Fallon's failure to respond to NDEP's comments and complete the document, and the fact that the current document will contain different information, community participation during review and approval of the revised Draft Final Decision Document may need to be addressed again.

Based on Appendix A in the Draft Final Decision Document (Administrative Record), the documents listed below were not included in the administrative record. These documents should be listed because they contain data, factual information, and analyses that form the basis for the selection of the response action.

- Progress Reports that included data or interpretations for Sites 11 and 16. This was previously requested in NDEP's letter dated March 5, 1996.
- Supporting documentation to verify field work including boring logs with soil screening results.
- Laboratory analytical reports.

6. Page 5, Section III, Investigation Summary: The Draft Final Decision Document states "*The phase II RI for Group IV Sites consisted of conducting 2 geophysical surveys, 29 soil borings, 202 groundwater test borings, 25 monitoring wells, and 9 piezometers. Most of these investigations were conducted to evaluate the dissolved and free product plumes on site 14 and Site 16.*"

Most of these activities cannot be used to assess the presence of contamination at Site 11. Those activities pertinent to Site 11 should be pointed out in this section. Site 11 was evaluated with two groundwater monitoring wells (MW63 and MW64) which were sampled twice. The Decision Document needs to include this information.

7A. Pages 5 and 6, Section A. Vadose Zone and Soil: The Draft Final Decision Document states*: "Field screening of soil samples collected during drilling indicated slightly contaminated soil (165 ug/L) at the bottom of the shallow aquifer only. Therefore, a soil sample from 16.5 to 18 ft BGS was submitted for laboratory analysis. The contamination detected by the laboratory consisted of common laboratory solvents, probably the result of laboratory induced contamination. See Table 1. No other soil samples were submitted for laboratory analysis because all other soil contamination appeared to be related to ground water contamination.*"

The RI Report states on page 10-44 "*Field screening of soil samples collected during drilling indicated highly contaminated soil at the capillary fringe and slightly contaminated soil at the bottom of the shallow aquifer only.*" Soil samples were not collected above the water table to investigate contamination that may have originated from Site 11, and there is no supporting documentation to verify that contamination at the capillary fringe isn't more widespread and extends to the ground surface. Also, according to page 10-45 in the RI Report, field screening consisted of measuring hydrocarbon vapors in head space air. This field screening method may not detect semivolatile organic compounds (SVOCs) with a low volatility. Therefore, the extent of contamination associated with Site 11 activities appears to be unknown. This information needs to be addressed in the Decision Document.

Of concern to the NDEP is that the boring logs with field screening results for Site 11 do not appear to be included in the administrative record and have not been submitted to the NDEP for review. If this information is to be used to support the "No Further Action" decision, then supporting documentation must be made available for review. See comment **14** regarding lack of supporting documentation.

7B. Page 6, Section A, Vadose Zone and Soil: The Draft Final Decision Document states: "*Ground water contamination below Site 11 is contiguous with the dissolved contaminant plume originating from Site 16. Source mitigation will be accomplished by the remedial action for Site 16, Old Fuel Farm.*"

Without analytical results for soil samples collected in the vadose zone from either MW63 or MW64, the nature and extent of contamination in the vadose zone at Site 11 cannot be properly interpreted and the source of groundwater contamination at Site 11 cannot be verified. It is likely that Site 16 is not the only source of contamination at Site 11 because paint wastes were disposed on the ground surface at Site 11 (see page 8-35 in the PA/SI Report) and groundwater contamination at Site 11 includes solvents which do not appear to originate from Site 16. The Decision Document needs to address these issues, and explain how source mitigation at Site 16 will be effective at Site 11. See Comment **3** for additional information.

8. Tables 1 and 2: Units for analytical results and detection limits in these tables need to be corrected.

9A. Pages 6 and 7, Section B, Groundwater: Several paragraphs in this section describe contaminant concentrations in ground water samples collected from monitoring wells MW63 and MW64. Contaminants that exceed the MCLs include benzene, trichloroethene (TCE), and 1,2-dichloroethane (1,2-DCA). NDEP's letter dated January 25, 1999 requested that drawings be provided which present concentration contours for these contaminants and illustrate the potential source areas. NAS Fallon has not responded to this request. The drawings provided in the Draft Final Decision Document were copied from the RI Report. Drawings from the RI Report show total contaminant concentrations, but do not provide data for specific contaminants that may originate from different sources. The draft CGA Report, dated December 1997, presents information that is more updated than the RI Report and does a better job illustrating contaminant sources. Based on the draft CGA Report, Site 11 may be the source of 1,2-DCA, benzene, and TCE contamination in groundwater (see figures 2.38, 2.39 and 2-40 on pages 2-134, 2-135, and 2-136, respectively). Contaminant-specific ground water plumes that may originate from Site 11 must be addressed in the Decision Document. This request is consistent with NDEP's letter dated March 5, 1996, which requested that the source area for the solvents detected in groundwater at Site 11 be identified. See comment **3** for additional comments**.**

Table 2 in the Draft Final Decision Document summarizes groundwater analytical results. The units for quantification limits in this table were incorrectly reported as g/L and need to be corrected.

The direction of groundwater flow has been well documented at NAS Fallon. Regionally, groundwater flows from the northwest to the southeast and generally has a strong influence on the movement of groundwater plumes. Changing stratigraphic conditions, such as a channel sand, may also control contaminant migration. In regards to Site 11, the Draft Final Decision Document states on page 7 (first paragraph): "*The source area for petroleum hydrocarbon (PHC) related contaminants detected in MW63 and MW64 is Site 16, the Old Fuel Farm*." Site 11, however, is located southwest of Site 16, not downgradient of Site 16. If NAS Fallon asserts that Site 16 is the source of contamination at Site 11, which is not consistent with the direction of groundwater flow, then a discussion that explains this condition is warranted.

Based on the January 1992 PSC Summary, solvents detected in MW 25U (south of Site 16 and east of Site 11) may be related to surface drainage from Hangar 4, Site 17, or to past disposal practices at the Paint Shop, Site 11. Additional characterization was recommended on the west side of the Site 16 plume to determine the source of non-fuel contaminants (see pages 164 and 168 in the PSC Summary).

The additional characterization work does not appear to have been completed. This work could have provided important information regarding the understanding of contaminant sources and appropriate remedial actions. The basis for not completing this additional characterization work must be provided in the Decision Document.

9B. Page 7, Section B, Groundwater, second paragraph on page: The Draft Final Decision Document states "*Bail tests from monitoring wells MW25, MW63, and MW64 resulted in hydraulic conductivity ranging from 1.6 to 6.5 ft day."*

Based on a review of Appendix E in the RI Report, bail tests were not conducted for MW25, and hydraulic conductivities in monitoring wells MW63 and MW64 ranged from 1.3 to 12.5 feet/day. Data in the Draft Final Decision Document need to be reviewed for accuracy and revised accordingly. NDEP previously provided comments on this issue in the letter dated March 5, 1996.

It should be noted in the Decision Document that bail tests provide qualitative hydraulic conductivity data and are less reliable than pumping tests for providing reliable hydraulic conductivities. At NAS Fallon, bail tests have generally underestimated hydraulic conductivities. The RI report states on page E-16 "*The results of the pumping tests indicate K values 5 to 125 times higher than the bail-test values. The bail-test data are considered strictly qualitative and yield a relative number for each location*". As stated on page 8 of the Draft Final Decision Document for Site 4, bail tests can yield hydraulic conductivities lower than the aquifer due to the "skin effect" which may also be more characteristic of the sand pack placed in the well instead of the aquifer. This information needs to be included in the Decision Document for Site 11.

In the absence of pumping tests, soils at the site should also be reviewed to evaluate hydraulic conductivities. The RI Report states on page 10-16 "*Monitoring wells MW26, MW27, MW63, MW64, and MW67 contain coarse-grain sediments of a paleo-channel. The sands in these wells appear approximately 5 to 6 ft BGL and have a thickness of 6 to 14 ft*." The presence of a channel sand indicates that the hydraulic conductivity at Site 11 is probably higher then the 1.5 to 6.5 ft/day measured by the bail tests. An sieve analysis was performed for MW63 to evaluate hydraulic conductivity. Based on sieve analyses of soil samples collected from MW63, the hydraulic conductivity ranges from 34.8 to 36.8 feet day. These values are significantly higher than the values presented in the Draft Final Decision Document, and need to be addressed in the final Decision Document for Site 11.

The Draft Final Decision Document for Site 11 states the groundwater velocity ranges from 0.9 to 3.5 feet/year based on hydraulic conductivities from the bail tests. However, groundwater velocities may be 5 to 20 times higher based on the analysis of soil conditions. This is important information for evaluating contaminant transport and needs to be included in the Decision Document.

10. Page 7, Section C, Risk Assessment Summary: The Draft Final Decision Document states "*A quantitative risk assessment was not conducted for Site 11 due to the lack of contamination associated with the site. Ground-water contamination below Site 11 is a result of overlapping contamination from Site 16, the Old Fuel Farm. See Figure 6, site 16 Plume Map. There is no current exposure, thus no current risk, from the groundwater"*.

The NDEP cannot concur with the above statement for the reasons discussed in previous comments. The lack of contamination in soils has not been demonstrated or documented. Also, the only soil sample collected and analyzed at Site 11 (see comment **7**) could not be used to perform a risk assessment as

indicated on page A-105 of the Baseline Risk Assessment (BRA) which states "*the soil sample was collected at 16.5 to 18 ft BGS and therefore, does not apply for purposes of human health and ecological risk assessment.*" Therefore, it would be more appropriate to state that a quantitative risk assessment could not be performed due to a lack of data.

The Site 16 plume map referenced above was copied from the RI Report and is currently out of date. Also, the groundwater plume drawn on this map shows only the extent of total contamination. The map does not address specific contaminants detected in groundwater, sources of the contaminants, contaminants that may originate from Site 11, or investigation data that were collected after the RI Report was completed (see comments **3**, **7** and **9**). Several source areas were identified south of Site 16 and at Site 11. Drawings which show the source areas and the extent of contamination for each contaminant of concern for Sites 11 and 16 need to be prepared and included in the Decision Document. NAS Fallon needs to review the draft CGA Report dated December 1997 (pages 2-134 through 2-136) and the January 1997 Semi-Annual Progress Report (page 94).

Until a better understanding of contaminant sources associated with the Sites 11 and 16 is achieved, and a risk assessment is conducted for contaminants associated with Site 11, the NDEP cannot concur with the statement "*There is no current exposure, thus no current risk*".

11. Page 7, Section D, Conclusion: The Draft Final Decision Document states: "*No contamination was indicated during testing of soil samples at Site 11. Contamination detected during the screening process was related to groundwater contamination. Groundwater contamination beneath the site is related to the up gradient Site 16, Old Fuel Farm. This dissolved phase plume will be addressed as part of the Site 16 remedial action.*"

    The NDEP does not concur with the conclusion for the reasons stated throughout this letter.

12. Page 7, Section IV, Proposed Action: The Draft Final Decision Document states "*No contaminants were detected during the investigation of the Site 11, Paint Shop. A quantitative human health or ecological risk assessment for soil were not conducted due to the absence of contamination at the site. Groundwater contamination below Site 11 is contiguous with the dissolved contaminant plume originating from Site 16. Source mitigation will be accomplished by the remedial action for site 16, the Old Fuel Farm. Based on this conclusion, the remedial decision for Site 11, Paint Shop is No Further Action. (ORNL 94 (I))"*

    The NDEP does not concur with the above statement for the reasons discussed throughout this letter. However, the NDEP did previously concur with "No Further Action" at Site 11 in the following correspondence:

    - NDEP's letter dated May 17, 1994 states "*The Division concurs with the recommendation of no further investigative or remedial actions at Site 11 at this time. The contaminated groundwater beneath the site will be addressed during remedial actions at Site 16*".

    - NDEP's letter dated August 21, 1997 states for Sites 10 and 11 "*No Further Actions are required at these sites. The groundwater monitoring program designed for Site 16 will monitor groundwater at these sites*".

    NDEP's concurrence with "No Further Action" in these letters was provided prior to the draft CGA Report dated December 1997 which presented proposed, revised interpretations for the extent of

groundwater plumes at Site 11. The NDEP is now concerned that the nature and extent of contamination associated with Site 11 does not appear to be well understood. Accordingly, the NDEP's previous concurrence with a "No Further Action" determination is no longer valid. NAS Fallon needs to re-evaluate Site 11. See comment **13** below.

13. Page 8, Section V, Future Activity at Site 11: NAS Fallon has asserted that administrative controls will be imposed on Site 11. Administrative controls are subject to future audit.

    As stated in Comment **12** above, NAS Fallon needs to re-evaluate Site 11. A proposed plan of action which addresses NAS Fallon's plans for re-evaluating contamination that appears to originate from Site 11 needs to be submitted to the NDEP for review. The plan of action also needs to address NDEP's concerns presented in this letter.

14. Page 8, Section VI, Recommendations: The Draft Final Decision Document states *"This Decision Document represents the selection of a no action alternative and subsequent closure for Site 11 at NAS Fallon, Fallon, Nevada. The no action alternative was developed in accordance with CERCLA as amended and is consistent with the NCP. This decision is supported by the documents in the administrative record for the site."*

    The NDEP does not concur with the above statement for the reasons discussed in this letter.

15. NAS Fallon needs to address all comments in NDEP's January 25, 1999 letter for Site 11. Comments which need to be addressed, but have not been completely discussed above are presented below.

    Item 3 in NDEP's January 25, 1999 letter
    Information or data that are used to support the "No Further Action" recommendation must include supporting documentation. Documentation does not need to be provided with the Decision Document, but needs to be present in NDEP's files. Supporting documentation for Site 11 missing from the NDEP files are listed below.

    - Documentation to verify field work including boring logs with soil screening results.
    - Laboratory analytical reports.
    - Sampling and Analysis Plan for the RI/FS (Volume III of the RI/FS Work Plan).

    NAS Fallon needs to either provide the supporting documentation, or state the supporting documentation does not exist and is not included in the Administrative Record.

    NDEP requested that metal concentrations in soil and groundwater at Site 11 be compared with background metal concentrations, and that a drawing which shows where the background samples were collected be provided. The Draft Final Decision Document responds by stating on page C-10 "*Comparison of metal concentrations to background metal concentrations will not be provided since metals are not the contaminants of concern at the site.*" This statement is not considered an appropriate response. Lead was determined to be a potential contaminant at Site 11. The PA/SI Report recommended on page 3-10 that lead be analyzed in samples collected from Site 11. The Decision Document needs to address this issue and explain why lead is no longer considered a contaminant of concern. If metals weren't analyzed at Site 11, then the Decision Document needs to state this and provide the basis for not including metals in the analytical program.